



Santa Ana Unified School District

Richard L. Miller, Ph.D., Superintendent

October 24, 2014

Tom Wheeler, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Comcast Acquisition of Time Warner Cable
Docket #14-479

Dear Chairman Wheeler,

As educators, we are committed to closing the Digital Divide by ensuring that all school children have access to quality education, including those students who live in low-income communities. Access to affordable high-speed Internet at home is a critical tool to achieving this goal and engaging parents in the education process. We applaud the Federal Communications Commission (FCC) for establishing a visionary path to empower all Americans with high-speed Internet access in the National Broadband Plan. We know you agree that too many people in California and around the nation still live without it. Now is the time to seize the opportunity to advance the national broadband goals and ensure a public benefit in the Comcast acquisition of Time Warner Cable (TWC) and trade of service areas with Charter Communications by requiring acceptable performance by Comcast in implementation of their Internet Essentials program.

According to the 2014 Annual Statewide Survey conducted by the Field Research Corporation, fully one-quarter of California households do not have high-speed Internet at home. About half of households with Spanish-speaking Latinos or earning under \$20,000 a year do not have home broadband access. As the economy moves online, our society is increasingly defined by those who have access to affordable high-speed Internet at home and those who do not. All students must have affordable broadband access at home to be successful in learning today in order to become productive earning adults tomorrow. Los Angeles Mayor Eric Garcetti, Los Angeles County officials, former California Superintendent of Public Instruction Delaine Eastin and more than four dozen leading non-profits from around California are asking the FCC to closely review the proposed Comcast-TWC deal.

As you know, Comcast launched a \$9.95-a-month broadband plan for families of students eligible to receive free-or-reduced lunch to secure federal government approval to purchase NBC Universal in 2010. In 3 years, Comcast has signed up only 14% of the eligible households in California. That is 46,250 households out of more than 313,000 eligible families. Conservative analysis shows that if the Comcast proposal is approved an estimated 1.375 million California households (more than 3 million K-12 students qualifying for free-or-reduced lunch) would be eligible for Internet Essentials in the new combined service territory. That would be 87% of all California students qualifying for free-or-reduced lunch.

The lackluster performance of Comcast to date provides no comfort that a larger corporate giant will perform any better unless you hold them accountable for acceptable performance. As you consider whether or not to approve Comcast-TWC-Charter deal, we strongly recommend the following requirements:

1. Include Low-Income Households
2. Set Performance Goals
3. Capitalize an Independent Fund and Coordinate with States
4. Establish an Advisory Oversight Committee
5. Offer Stand-Alone Internet Service

It is important for you to understand why there is a deep need for Comcast to capitalize an independent fund in California to support outreach to eligible families and to provide digital literacy training. As the Internet Essentials program is currently operated there are many problems with the sign-up process and schools are put in an awkward position of being an agent-advocate for a private company in interfacing with eligible families. Schools also inevitably become the point of access for parents when there are problems with the program. Further, outreach to low-income households requires an awareness of the culture and proficiency with the language of the families. Comcast is not effective in fulfilling these functions.

However, we do know first-hand that there are many experienced community organizations that have proven track records in reaching residents in low-income neighborhoods and that they can be efficiently coordinated in collaboration with schools. Further, an investment by Comcast in an independent fund to sign up households for Internet Essentials will be recouped by the company in relatively short period of time because the new customers will be paying a monthly subscription. And, as has been recommended by the California Emerging Technology Fund and more than 20 other civic leadership organizations, if the administration of such an independent fund is selected by a state agency through an open, competitive process, then there will be transparency and accountability that is not the case today with Comcast. Finally, please keep in mind that in California previous corporate mergers and acquisitions involving Pacific Telesis, SBC, AT&T and Verizon have resulted in the capitalization of independent funds to ensure a public benefit.

We embrace the mission of the National Broadband Plan “to create a high-performance America—a more productive, creative, efficient America in which affordable broadband is available everywhere and everyone has the means and skills to use valuable broadband applications.” You now have the opportunity to take a vitally important step to accomplish this goal. We urge you to take it.

Sincerely,



David Haglund, Ed.D.
Deputy Superintendent

cc: Mignon Clyburn, Commissioner
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